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July 14, 1995

BY MESSENGER

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

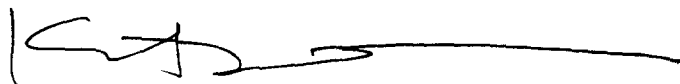
Re: Review of the Commission's Regulations Governing
Programming Practices of Television Networks and
Affiliates, MM Docket 95-92
Review of the Commission's Regulations Governing
Broadcast Television Advertising, MM Docket 95-90
Review of the Commission's Regulations Governing
Television Broadcasting, MM Docket 91-221 ✓
Review of the Communication's Regulations Governing
Attribution of Interests, MM Docket 94-150

Dear Mr. Caton:

Post-Newsweek Stations, Inc. ("Post-Newsweek"), pursuant to Section 1.1206(a)(2) of the Commission's Rules, 47 C.F.R. § 1.1206(a)(2) (1994), hereby notifies the Commission that William G. Ryan, president of Post-Newsweek, and Robert E. Branson, Esq., vice president and chief legal counsel of Post-Newsweek, met on July 13, 1995 with Commissioner James H. Quello, his legal advisor, Maureen O'Connell and his senior legal advisor, Lauren J. Belvin; Commissioner Andrew C. Barrett and his legal advisors Lisa B. Smith and Brian Carter; and Commissioner Susan Ness and her legal advisor, David A. Siddall. A summary of the substance of presentations made by Messrs. Ryan and Branson is attached.

Please direct any inquiries concerning this matter to the undersigned.

Very truly yours,



Kurt A. Wimmer

Attorney for Post-Newsweek
Stations, Inc.

COVINGTON & BURLING

Mr. William F. Caton
July 14, 1995
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cc: Hon. James H. Quello
Hon. Andrew C. Barrett
Hon. Susan Ness
Maureen O'Connell, Esq.
Lauren J. Belvin, Esq.
Lisa B. Smith, Esq.
Brian Carter, Esq.
David A. Siddall, Esq.

POST-NEWSWEEK STATIONS, INC.
TALKING POINTS

- Post-Newsweek Stations, Inc. has in the past and does support deregulation of the broadcast industry, but we believe the public interest mandates that the Commission not deregulate simply for the sake of deregulating.
- The issues before Congress in the Telecommunications Bill and before the FCC in its ownership and network rules could have a serious detrimental impact on local broadcasters and the communities they serve.
- These issues are much broader than simply a "network vs. affiliates" battle. While no one knows what the end result will be, one can speculate that a very few entities could end up owning both the content and the conduit for the majority of the communication services.
- The United States has a system of local and national broadcasting that is the envy of the rest of the world.
- The current system promotes the Commission's dual public interest goals of diversity and competition.
- The national rules should not be modified. They have well served the public and helped create new national networks.
- Modification or elimination of the national ownership rules would lead to greater media concentration and a reduction in competition. In addition, it could close the door to ownership opportunities for new players.
- Rather than the current system with many diverse voices, the public could be left with a system made up of a few owners and the decisionmaking process being concentrated in New York, Los Angeles, Chicago, or Denver.
- The duopoly rule has encouraged competition among local television stations.
- The duopoly rule should only be modified by relaxation of the prohibited contour from a Grade B to a Grade A standard.
- Elimination or drastic modification of the rule could lead to undue concentration and loss of media diversity in the local community.
- Local Marketing Agreements (LMAs) should not be permitted by the Commission.
- If the Commission determines that it desires to authorize LMAs they should be subject to very specific Commission rules.
- Post-Newsweek does not oppose the creation of a "financial litmus test" or other means to assist failed stations or unused frequencies.
- The Commission must proceed cautiously on its review of the network rules.
- The network rules ensure that the local stations have the ability to fully serve their communities without undue influence from the networks.

- Any modification of the network rules must be done with an understanding of the impact of proposed changes to the ownership rules and an eye towards the impact on local stations, the local community and new entrants.
- Post-Newsweek supports the Commission's elimination of the financial interest and syndication.
- Post-Newsweek believes the Commission should provide a transition period before it eliminates the prime time access rule. A one to three year period would permit the market enough time to react to changes.
- Elimination or modification of the "right to reject," "network representation," "control of station advertising rates," "time option," "exclusivity," rules would disserve the public interest.
- The "dual network" rule should be retained since it prevents undue media concentration and encourages competition.